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*Attorney for Plaintiff and the Proposed
Class*

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

PAUL RYAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WILSHIRE LAW FIRM. P.L.C.
Defendant.

DISCOVERY MATTER

*PRESENTED TO MAGISTRATE
JUDGE MARGO ROCCONI*

Case No. 2:24-cv-08816-
CV-MAR

**PLAINTIFF'S NOTICE
OF MOTION TO
COMPEL DISCOVERY
FROM DEFENDANT
PURSUANT TO LR 37-2**

**Date and Time of Motion
Hearing: June 11, 2025**

**Discovery Cutoff date:
[Not Yet Set]**

**Pre-Trial Conference
date: [Not Yet Set]**

Trial date: [Not Yet Set]

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT, ALL PARTIES,**

2 **AND THEIR ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that on Wednesday, June 11, 2025, at 11 AM, or
4 as soon thereafter as the matter may be heard in courtroom 790 of the above
5 entitled court, located at Roybal Federal Building and United States Courthouse,
6 255 E. Temple St., Los Angeles, CA, 90012, Courtroom 790, 7th Floor, before the
7 Honorable Margo A. Rocconi of the United States District Court for the Central
8 District of California, Plaintiff Paul Ryan, will, and hereby does, move the Court to
9 compel certain responses to the Plaintiff's discovery by the Defendant, Wilshire
10 Law Firm, P.L.C., pursuant to Local Rule 37 and Rule 37 of the Fereral Rules of
11 Civil Procedure. This Motion is made on the grounds in the accompanying Local
12 Rule 37-2 Joint Statement, the records and pleadings on file in this matter, and any
13 other evidence that may be presented to the Court at or before the time of the
14 hearing.

15 **Local Rule 37-1 Compliance.** This motion is made following the
16 conference of counsel pursuant to Central District Local Rule 37-1.

1 Dated: May 16, 2025
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3
4

5 RESPECTFULLY SUBMITTED,
6 BY:

7 /S/ ANDREW ROMAN PERRONG

8 ANDREW ROMAN PERRONG
9 (*PRO HAC VICE*)
10 (A@PERRONGLAW.COM)
11 PERRONG LAW, LLC
12 2657 MOUNT CARMEL AVENUE
13 GLENSIDE, PA 19038
14 OFFICE: 215-225-5529

15
16 **CERTIFICATE OF SERVICE**
17

18 I hereby certify that, on May 16, 2025, I caused the foregoing to be
19 electronically filed with the Clerk using the CM/ECF system, which will send
20
21 notification of such filing to all counsel of record.

22
23 /s/ Andrew R. Perrong
24 Andrew R. Perrong
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